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Attorneys for Defendant
 EFRAIN REYES

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EFRAIN REYES et al,

Defendant.

Case No. CR 18-417 CRB [JCS]

**EFRAIN REYES' MODIFIED *EX PARTE*
 APPLICATION FOR ORDER
 PERMITTING TRAVEL OUT OF
 DISTRICT; [Proposed] Order**

I, Julia Mezhinsky Jayne, declare:

1. I represent Defendant Efrain Reyes in the above-entitled matter. He is currently released an unsecured \$50,000 bond with travel restricted to the Northern District of California. The purpose of this application is to request that Mr. Reyes be allowed to drive to Los Angeles, California from October 15-22, 2019 to attend his father-in-law's funeral. Mr. Reyes' wife is currently pregnant with their second child and therefore, Mr. Reyes wants to accompany her to the funeral. He intends to drive to and from Los Angeles.
2. This application and order would modify the dates of travel listed in the previous application and order I filed in this matter. On October 3, 2019, I filed an application to request that Mr. Reyes be allowed to drive to Los Angeles, California from October 10-18, 2019. Dkt. 78. The Court signed an order permitting Mr. Reyes to travel to Los Angeles from October 10-18, 2019. Dkt. 79.

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3. I have contacted AUSA Ross Weingarten, who informed me that he has no objection to Mr. Reyes' request.
4. Pretrial Services Officer Josh Libby, who monitors Mr. Reyes, has informed me that he has no objection to this request.
5. Based on the foregoing, I respectfully request that the conditions of Mr. Reyes' release be modified so that he may be permitted to travel to Los Angeles, California from October 15-22, 2019. All other conditions of Mr. Reyes' release shall remain the same. Furthermore, Mr. Reyes shall inform his pretrial services officer of all travel-related details.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: October 9, 2019

/s/
JULIA JAYNE
Attorney for EFRAIN REYES

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing:

IT IS HEREBY ORDERED that the conditions of Defendant Efrain Reyes' release shall be modified as follows:

Mr. Reyes is permitted to travel to Los Angeles, California from October 15-22, 2019. All other terms and conditions shall remain in place.

DATED: _____

HONORABLE MAG. JUDGE JOSEPH C. SPERO
United States Magistrate Court Judge